



Joint Base Charleston - Air Environmental Restoration Program Charleston, South Carolina



STATEMENT OF BASIS

**Joint Base Charleston-Air
Charleston, South Carolina**

Facility/Unit Type: Joint Base Charleston-Air/Area of Concern (AOC) L (SS038)

Contaminants: None

Media: None

Proposed Remedy: No Further Action (NFA)

INTRODUCTION

The purpose of this Statement of Basis (SB) is to present the decision for Area of Concern (AOC) L (SS038), which is No Further Action (NFA), and to invite public comment on this proposal. This SB provides AOC L (SS038) background information and explains the reasons NFA is proposed. See **Figure 1** for a facility location map.

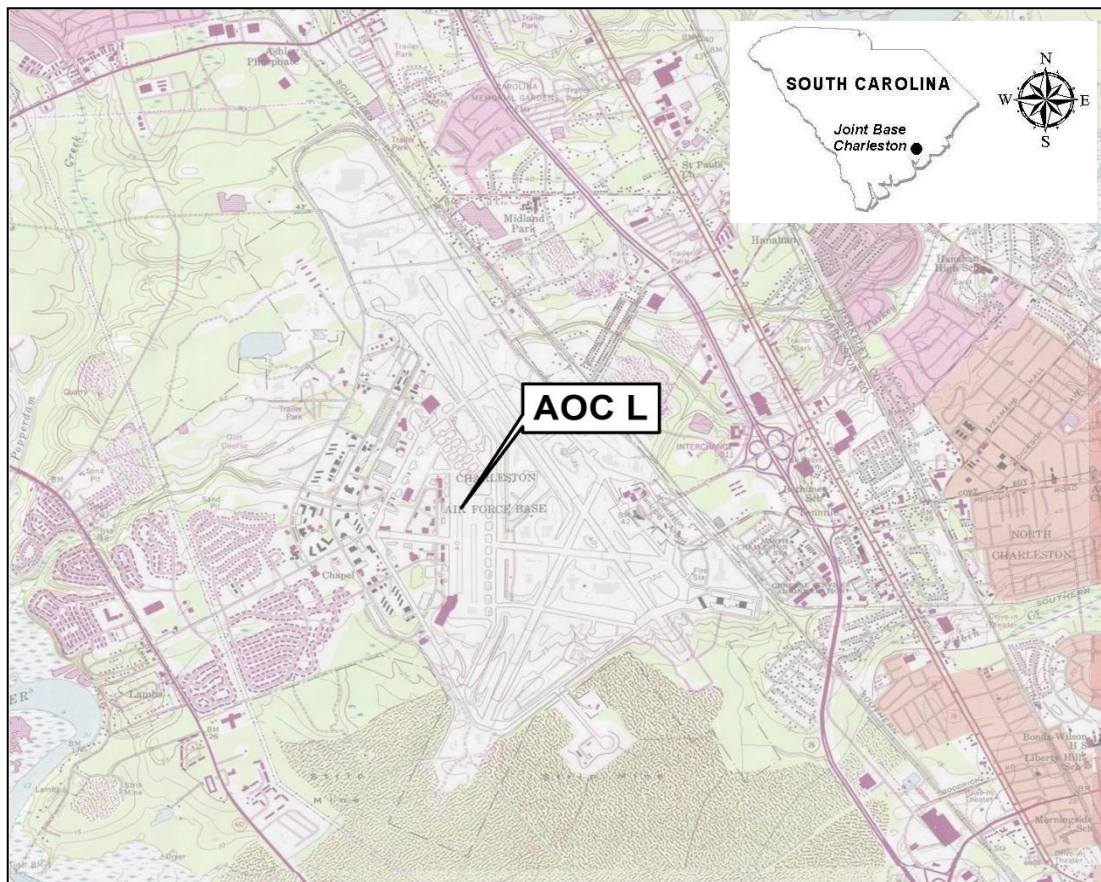


Figure 1 AOC L (SS038) Site Location – Joint Base Charleston - Air, SC

Joint Base Charleston-Air (JB CHS-Air) is located in Charleston County, approximately 10 miles northwest of Charleston, South Carolina. JB CHS-Air comprises 3,731 acres of contiguous property with a Base population of approximately 8,500. The host command at JB CHS-Air is the 628th Air Base Wing, whose primary mission is to maintain immediate airlift capability to deliver and sustain air and combat

forces to combat locations throughout the world. During peacetime, operations include re-supply of overseas American embassies and military installations and supply of aid to natural disaster areas.

This SB presents the proposed remedy that NFA was selected for AOC L (SS038). A site map for AOC L (SS038) is provided as **Figure 2**; the approximate location of AOC L (SS038) is noted on the figure. JB CHS-Air and South Carolina Department of Health and Environmental Control (SCDHEC) jointly developed the specific site remedy described herein and are issuing this SB as part of their public participation responsibilities under Section 7004(b) of the Resource Conservation and Recovery Act (RCRA) Title 42, United States Code (U.S.C.) Section 6974(b), and applicable state law. This document is intended to inform the general public of the proposed remedy for this site and follows the United States Environmental Protection Agency (USEPA) Office of Solid Waste and Emergency Response (OSWER) Directive 9902.6. SCDHEC will not approve the proposed remedy until the public comment period has ended and all information submitted during the public comment period has been reviewed and considered. SCDHEC may modify the proposed corrective action or select another action based on new information or public comments received on this proposal. Therefore, the public is invited to review and comment on all alternatives, including any potential corrective measures that were not previously considered.



Figure 2 Site Map of AOC L (SS038) – (From URS, December 4, 2012) Joint Base Charleston-Air, SC

The information summarized in this SB can be found in greater detail in documents contained in the Information Repository for this facility. This SB does not replace those documents. Historical documents can be found in the administrative record at JB CHS-Air and the SCDHEC office located in Columbia, South Carolina (addresses provided at the conclusion of this document). SCDHEC encourages the public to review these documents in order to gain a more thorough understanding of the site and the activities that have been conducted.

PROPOSED REMEDIES

The recommended alternative for AOC L (SS038) is NFA. This remedy was selected by SCDHEC in the March 28, 2013, approval letter for the *Request to Associate AOC L (SS038) (JP-4 Spill No. 2) with AOC P (Underground Fuel Line Leak)* (URS, Inc. [URS], December 4, 2012). Please note that SCDHEC's March 28, 2013 letter incorrectly identified the AOC L (SS038) site as Jet Petroleum 4 (JP-4) Spill No. 2. The correct identification shown in the RCRA Part B Hazardous Waste Management Permit SC8 170 022 620 (the RCRA Part B Permit) is JP-4 Spill No. 1.

SITE BACKGROUND

Environmental and Civil Engineering (CE) Records from the Base indicate the approximate location of AOC L (SS038) is on the Aircraft Maintenance Apron near solid waste management unit (SWMU) 40. AOC L (SS038) refers to a JP-4 fuel spill occurred in 1976 on the Maintenance Apron. Base personnel recorded spills and other incidents, but were not required to record the exact location of spills or other incidents until 1986. A records search was unable to determine the exact location where the spill occurred or the quantity of JP-4 fuel released during the spill.

SITE INVESTIGATIONS

A memorandum from Mr. Al Urrutia with the Charleston Air Force Base (AFB) to the SCDHEC dated May 23, 1994 indicates little information is known about the site. An attempt to accurately determine the location of the spill was conducted in 1994 through records search and personnel interview. However, the results were inconclusive.

Correspondence from the SCDHEC to the AFB (dated April 10, 1995) indicates a NFA designation was requested by the AFB in a RCRA Facility Investigation (RFI) work plan (no date was provided). This request was denied in a letter dated March 17, 1994, as the Ground-Water Protection Division (GWPD) of the SCDHEC felt it was inappropriate to list a site as NFA with no location and no available data, and the SCDHEC requested further information. However, the 1995 correspondence indicates the GWPD conceded that the location is unknown and that no data exists to indicate a release had impacted the environment. The GWPD would not consider the 1976 JP-4 spill as an actual project.

Based on the findings to date, Joint Base Charleston-Air (formerly Charleston AFB) requested NFA approval from the SCDHEC in a letter dated April 27, 2010. SCDHEC reviewed the request with respect to the South Carolina Hazardous Waste Management Regulations and applicable sections of the Joint Base Charleston-Air RCRA Part B Permit. However, the request was denied in a letter dated June 16, 2010. According to the letter, the *Interim RCRA Facility Assessment Report* dated March 1990 and a figure from the *RCRA Part B Permit Renewal* dated May 2009 had noted the JP-4 spill had washed into the storm system and clarification was requested on the lack of inclusion on the April 2010 NFA request.

According to the *AOC L Site Association with AOC P* letter to the SCDHEC (URS, December 4, 2012), recent correspondence with the SCDHEC had identified the possibility of associating AOC L (SS038) with site AOC P (DD540). Catch basins associated with the nearby flight line ditch (SWMU 146) and the flight line ditch into site AOC B (Building 99 Fuel Spill) would have had similar contaminants of concern (benzene, toluene, ethylbenzene, and xylene); however, SWMU 146 and AOC B had been granted a NFA status from the SCDHEC. Additional file review of environmental and CE files conducted during the week of October 28, 2011 revealed nothing conclusive. Additionally, an interview conducted with the JB CHS-Air CE Flight Chief indicated that the spill was cleaned up "expeditiously," and any runoff that may have resulted from the spill would have drained into a catch basin that drained the Maintenance Apron and flowed via a storm drain toward AOC P (DD540).

Based on the inability to determine the exact location of AOC L (SS038), and the high probability that any contamination originating from AOC L (SS038) would be addressed by the ongoing remedial actions being undertaken at AOC P (DD540), SCDHEC approved the request to associate AOC L (SS038) with AOC P (DD540) and grant NFA status to AOC L (SS038) in a letter dated March 28, 2013.

SUMMARY OF SITE RISKS

Although the exact location of the 1976 JP-4 spill was unable to be identified during extensive file reviews, available information indicates the spill was cleaned up in an expeditious manner and that any

runoff from the concrete apron would have drained into a storm water drain flowing towards AOC P (DD540). AOC P (DD540) is currently being addressed by remedial actions, and no data exists to indicate the JP-4 spill associated with AOC L (SS038) has impacted the environment. Based on the current and historical information, AOC L (SS038) presents no unacceptable risk for any future use.

SCOPE OF CORRECTIVE ACTION

NFA is selected for AOC L (SS038).

CONTINGENCY REMEDIES

Contingency remedies are not necessary for NFA at AOC L (SS038).

ANTICIPATED IMPACTS OF CLEANUP ON THE LOCAL COMMUNITY

No significant impacts to the local community are associated with the proposed NFA at AOC L (SS038).

STATUTORY AUTHORITIES

This document is being issued in accordance with 40 Code of Federal Regulations (CFR), in compliance with federal hazardous waste management requirements. The JB CHS-Air Corrective Action Program is conducted under the authority of Sections 3004(u), 3004(v), 3005(c)(3), 3008(h), 3013, 6001, and 7003 of the RCRA (42 U.S.C. 6901 et seq.) as amended by the Hazardous & Solid Waste Amendment of 1984 (HSWA) (Pub. L. No. 98-616, 98 Stat. 3221) and the Federal Facility Compliance Act of 1992 (FFCA) (Pub. L. 102-386, 106 Stat. 1505). This SB is part of the corrective action process and is a requirement of the RCRA Part B Permit SC8 170 022 620, issued to JB CHS-Air by SCDHEC.